

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

**BASF CORPORATION, as successor in interest to  
CIBA CORPORATION,**

**Plaintiff,**

**v.**

**AIU INSURANCE COMPANY, ALLIANZ  
GLOBAL RISKS US INSURANCE COMPANY,  
ALLIANZ VERSICHERUNGS-AG, ALLSTATE  
INSURANCE COMPANY, AXA GROUP AG, AXA  
INSURANCE COMPANY, EMPLOYERS  
MUTUAL CASUALTY COMPANY, FIRST STATE  
INSURANCE COMPANY, GRANITE STATE  
INSURANCE COMPANY, HDI GLOBAL  
INSURANCE COMPANY, HDI GLOBAL SE,  
INSCO LTD., INSURANCE COMPANY OF  
NORTH AMERICA, INSURANCE COMPANY OF  
THE STATE OF PENNSYLVANIA, INTERSTATE  
FIRE & CASUALTY COMPANY, NATIONAL  
UNION FIRE INSURANCE COMPANY OF  
PITTSBURGH, PA, NEW ENGLAND  
INSURANCE COMPANY, RSA INSURANCE  
GROUP LIMITED, TIG INSURANCE COMPANY,  
TRAVELERS CASUALTY & SURETY  
COMPANY, TWIN CITY FIRE INSURANCE  
COMPANY WESTPORT INSURANCE  
CORPORATION and ZURICH INSURANCE  
GROUP LTD.,**

**Defendants.**

**Civil Action No. 2:24-cv-993-RMG**

**SCHEDULING ORDER**

Plaintiff BASF Corporation, as successor in interest to CIBA Corporation (“BASF”) and the AIG Insurer Defendants<sup>1</sup> (collectively, the “Lead Parties”) respectfully submit this Joint Proposed Scheduling Order and agree and request that the Court order as set forth below:

1. All Defendants shall respond to the Amended Complaint by June 28, 2024.
2. If any Defendant moves to dismiss the Amended Complaint, Plaintiff must file any opposition brief by July 26, 2024, and Defendants must file any reply brief by August 9, 2024.

May 30, 2024

**COLLINS & LACY, P.C.**

/s/ Christian Stegmaier

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*Counsel for BASF Corporation*

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<sup>1</sup> Defendants AIU Insurance Company, Granite State Insurance Company, Insurance Company of the State of Pennsylvania, and National Union Fire Insurance Company of Pittsburgh, Pa.

SO ORDERED this 7th day of June, 2024:

s/Richard M. Gergel  
Hon. Richard M. Gergel